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Via ECF

August 21, 2018

Honorable Edgardo Ramos
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, New York 10007

Re.: Figueroa v. 155 East 33rd Street Family Limited Partnership, et al
Case No.: 18 CV 02621

Dear Judge Ramos:

I write this letter in response to the letter of plaintiff's attorney, dated August 20, 2018.

Firstly, despite counsel's representation, plaintiff has already received discovery responses from the defendant, 155 East 33rd Street Family Limited Partnership and Alfredo Battaglia. Responses from Mathias Peter s/h/a Peter Mathias and LTF2 LLC shall be served on or before September 4.

Secondly, contrary to Counsel's further assertion, defendants are not "stonewalling this matter". The only one holding up progress in this matter is counsel himself in his refusal to grant basic courtesies that are granted everyday between attorneys. In fact, it is counsel's basic claims of "stone walling" and "needless delay" by the defendants, that makes this case a perfect choice for mediation. The whole purpose of mediation is the possibility of a speedy disposition, and the avoidance of unnecessary legal fees, which are of grave concern to the defendants herein.

I therefor reiterate the defendants' respectful request for referral of this matter to non-binding mediation.

Thank you.

Very truly yours,

Kathleen E. Negri Stathopoulos, Esq.

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